



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

IMPORTANT - ALL READ

**BECAUSE THIS MEMORANDUM IS SO IMPORTANT, I AM DIRECTING
DESK-TO-DESK DELIVERY TO EVERY SUPERFUND EMPLOYEE**

MEMORANDUM

SUBJECT: Superfund Accelerated Cleanup Model (SACM)

FROM: Don R. Clay *DRC*
Assistant Administrator

TO: All Superfund Staff, Managers, Regions, and HQs

As most of you know, the Office of Solid Waste and Emergency Response, Office of Emergency and Remedial Response, has been working on a new model for streamlining and accelerating the Superfund program. Plans for full development of the Superfund Accelerated Cleanup Model (SACM) began after the Administrator's approval on February 27.

The concept, borne of staff creativity and Total Quality Management, has been designed to make Superfund work better and deliver results the public will value: 1) quick reduction of acute risks at all Superfund sites (removal and remedial) and 2) restoration of the environment over the long term. The new model consists of:

- o A one step site screening and risk assessment at the front end of the process
- o Regional management teams to "traffic cop" all sites to:
 - 1) Early Action to reduce immediate risk to people and the environment and/or
 - 2) Long-term Cleanup to restore environment; and
- o A combination of enforcement, community relations and public involvement throughout the entire process.



The promise of implementing SACM is that we can achieve immediate risk reduction at a larger number of sites, do the work more efficiently, move more money into actual cleanup, and work more effectively by eliminating duplicative assessment steps.

Representatives from Headquarters and the Regions will meet in mid-April to brainstorm, resolve issues, and develop solutions and real-time plans to implement SACM.

This concept has been presented to diverse and sizable audiences, and while it has produced many comments and questions, it has been well-received and has generated a good deal of enthusiasm and support.

Since this will be the future of the program, I urge you to familiarize yourself with the SACM conceptual write-up and briefing package attached. I also urge the development of dialog on SACM implementation at all levels and across all functions in the Superfund program, both in Headquarters and the Regions. I will keep you informed of updates and changes that may occur.

Attachments

SUPERFUND ACCELERATED CLEANUP MODEL (SACM!)

THE NEW SUPERFUND PARADIGM

Introduction

The present Superfund program operates within a complex and, at times circuitous pattern that was designed ten years ago to accommodate a new and complicated law, then tinkered with as the program lurched from its infancy. The result has been a somewhat "jerry built" structure, altered to fit everyone's perceived needs and a host of conflicting expectations, but basically satisfying few. Early implementation focused on numerous intricate administrative and legal requirements. However, recent budget emphasis has dramatically shifted towards construction; policy emphasis has moved from Fund to enforcement. Various committees and workgroups continue to suggest ways to speed up the process. Congress will soon consider many ideas for restructuring under Reauthorization.

Amidst this evolution, however, a few facts are unlikely to change - the public does not understand our present process or grasp the full scope of our work. It wants faster cleanups, and believes that enough money has been given to Superfund to get the job done. The bottom line is that we can expect neither a lowering of expectations, nor a rise in resources. These factors have crystallized into a new focus on radically speeding up and streamlining the program.

OERR/OSWER 3/1/92

Background

The current system for Superfund cleanups is based on two discrete programs -- remedial and removal. The remedial component is a series of steps to define and address long term cleanup sites on the National Priorities List (NPL). Separate and apart are the activities of the removal program. These sites enter our system through a different "door," usually the States (through the National Response Center) seeking our help at a specific release. Some are spontaneous "screaming emergencies," others are prioritized for short term action as money becomes available. While the removal program generally does not address ground water, many of the other risks and response actions associated with the two programs are similar. Yet, there are enormous differences between remedial and removal actions regarding the depth of investigation, and cost and time expended to complete a cleanup.

In summary, the innate complexity of our process and our heretofore unsuccessful attempts to portray progress have left the Superfund program highly vulnerable to criticism. Therefore, we must focus attention on a few major outcomes that the public will value. -- We must make sure we deliver these outcomes and do it in terms the public will understand. For this reason, the new Superfund paradigm must be:

- o simple and flexible -- to allow fastest possible, worst first, risk reduction;

- o free of administrative contrivances that divide and diffuse the totality of reduced risk at remedial and removal sites;
- o realistically achievable in that we make realistic cleanup commitments and deliver them on time; and
- o focused on rapid protection of people and the environment and disconnected from the single and unattainable goal of returning all groundwater to pristine condition.

The New Superfund Accelerated Cleanup Model

Under this paradigm all sites on which Superfund takes any kind of cleanup action are Superfund sites. The distinctions between "remedial" and "removal" are eliminated. Rather than viewing these two entities as separate programs, they are viewed as separate legal authorities with different, but complimentary, application at Superfund sites.

Rather than entering the program through one of two doors marked "remedial" or "removal", all sites enter through one marked "Superfund". All site assessment takes place in one program, combining, as appropriate, elements of present removal

assessments, PA/SIs, RI/FSs, and risk assessments. During the assessment process, a Regional Decision Team institutes short term activities that address all threats to the health and safety of the existing population. These actions include cleanup activities generally taking no more than three or, at the most, five years -- a reasonable time frame based on the program's demonstrated ability to identify and address immediate risks to people and the environment within three to five years.

These activities are published in the Federal Register (for public information purposes only, not as a rulemaking) on an **Early Action List**. It is crucial to note here, that though these actions are "short term" and quickly implemented, they could eliminate the majority of human risk from Superfund sites. Enforcement activities would commence with immediate PRP notification, expedited orders/negotiation, and opportunity for voluntary cleanup. Because the vast majority of risk reduction occurs in this part of the program, most of EPA's public participation/information activities are focused here. Community relations and opportunities for Technical Assistance Grants (TAGs) continue as they do today. The State role is confirmed in its present configuration; further, they can continue with their own State-funded programs, resulting in a net increase of cleaned-up sites nationwide.

The Regional Decision Team can also determine if and when long term remediation (e.g., ground water restoration) is appropriate. Sites would then be placed on the **Long**

Term Remediation List (formerly known as the NPL), and cleaned up over many years. Regional Decision Teams could also decide that no Federal action was appropriate or that the site should be deferred to RCRA or other response authority.

The major parameters of this concept are outlined below.

1. Single Site Assessment Function. There are a number of redundancies in the beginning of the program as it is structured today. Hazardous waste sites can receive numerous similar, but sequential, assessments before any kind of cleanup begins. Sites are evaluated by the removal program (removal assessments), the site assessment program (PAs, SIs, Expanded SIs, and Hazard Ranking System (HRS) scoring), the remedial program (RIs, baseline risk assessments, and FSs), and even the RCRA program. ATSDR, State, local, and private party assessments may also occur. Many, if not most of these assessments start from scratch, -- they do not necessarily take into consideration the information and data generated by the studies that preceded them. This happens not only because of the obvious financial incentives to the contractor community and the human inclination to distrust the work of others, but because each part of the program is gathering data to respond to its particular perceived need. The site-assessment program wants to know if it will score on the HRS; the